

The Honorable Tana Lin

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEON COLE,

Plaintiff,

v.

AMAZON.COM SERVICES LLC;  
AMAZONFRESH LLC; and DOES 1  
through 2, inclusive,

Defendants.

No. 2:24-cv-01147-TL

STIPULATED MOTION AND  
~~PROPOSED~~ ORDER  
EXTENDING CASE DEADLINES

NOTE ON MOTION CALENDAR:  
March 3, 2025

**STIPULATED MOTION**

Pursuant to LCR 7(d)(1) and 10(g), Plaintiff Deon Cole and Defendants Amazon.com Services, LLC and AmazonFresh LLC (collectively “Amazon”), jointly request and stipulate to extend certain case deadlines. The Parties previously stipulated to extensions of the case deadlines three times, which the Court granted. *See* Stipulations and Order (Dkt. Nos. 30, 38, 41-42). The Parties make this request by stipulated motion, in accordance with the Court’s recent directive. *See* Notice to Parties Regarding Deadlines (Dkt. No. 42) at 2 (“[S]hould the Parties seek to extend additional deadlines going forward, they must file an appropriate motion requesting as much.”). In support of this stipulated motion, the Parties state as follows:

1. On March 28, 2024, Plaintiff filed a complaint against Amazon in Los Angeles Superior Court. The case was transferred to this Court on July 26, 2024, Order (Dkt. No. 21), and Plaintiff filed his Amended Complaint on September 26, 2024. Am. Compl. (Dkt. No. 32).

2. On November 1, 2024, Amazon moved to dismiss the Amended Complaint. Mot. to Dismiss (Dkt. No. 37). The Court granted the Motion on February 2, 2025, and ordered that any second amended complaint shall be filed no later than March 10, 2025. Order (Dkt. No. 44).

3. The Parties previously sought extensions of certain case deadlines, including the deadline to conduct a Federal Rule of Civil Procedure 26(f) Conference, the deadline for Initial Disclosures, and the deadline for filing a Joint Status Report, Stipulations (Dkt. Nos. 30, 38, 41), which the Court granted, Notice to Parties Regarding Deadlines (Dkt. No. 42).

4. Given that Plaintiff intends to file a second amended complaint, and that Amazon intends to file a motion to dismiss that amendment, the Parties jointly agree to extend certain case deadlines in anticipation of that amendment and motions practice. Good cause exists for this extension because if the Court were to grant Amazon's second motion to dismiss and close the case, then compliance with these case deadlines would become moot. Accordingly, in the interest of judicial economy, and avoiding potentially unnecessary costs for the Parties, the Parties stipulate to extend certain case deadlines as follows:

Case Event	Current Deadline	Proposed Deadline
Deadline for FRCP 26(f) Conference	3/10/2025	7/11/2025
Deadline for Initial Disclosures	3/24/2025	7/25/2025
Deadline for Filing Motion to Dismiss Second Amended Complaint	3/24/2025	4/7/2025
Deadline for Filing Opposition to Motion to Dismiss Second Amended Complaint	4/21/2025	5/5/2025
Deadline for Filing Reply in Support of Motion to Dismiss Second Amended Complaint	5/12/2025	5/19/2025
Deadline for Joint Status Report	4/7/2025	8/8/2025



~~PROPOSED~~ ORDER

The Court GRANTS the Parties' stipulated motion and the case deadlines are extended as follows:

Case Event	Current Deadline	Proposed Deadline
Deadline for FRCP 26(f) Conference	3/10/2025	7/11/2025
Deadline for Initial Disclosures	3/24/2025	7/25/2025
Deadline for Filing Motion to Dismiss Second Amended Complaint	3/24/2025	4/7/2025
Deadline for Filing Opposition to Motion to Dismiss Second Amended Complaint	4/21/2025	5/5/2025
Deadline for Filing Reply in Support of Motion to Dismiss Second Amended Complaint	5/12/2025	5/19/2025
Deadline for Joint Status Report	4/7/2025	8/8/2025

IT IS SO ORDERED this 4th day of March 2025.



HONORABLE TANA LIN  
UNITED STATES DISTRICT JUDGE

PRESENTED BY:

DAVIS WRIGHT TREMAINE LLP  
Attorneys for Amazon.com Services LLC  
and AmazonFresh LLC

By s/ John Goldmark  
John A. Goldmark, WSBA #40980  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 757-8136  
Email: johngoldmark@dwt.com

THE WARD FIRM  
Attorneys for Plaintiff Deon Cole

By s/ Justin L. Ward (pro hac vice)  
Justin L. Ward, CSBA # 225363  
2121 Natomas Crossing Dr, Ste 200-389  
Sacramento, CA 95834  
Telephone: 916-443-2474  
Email: thewardfirmca@gmail.com

STIPULATED MOTION AND ~~PROPOSED~~ ORDER  
EXTENDING CERTAIN DEADLINES (2:24-cv-01147-TN) - 4

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax